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August 6, 2022

VIA ECF

The Honorable Denise L. Cote
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Ad Hoc Group of Unsecured Claimants v. LATAM Airlines Group S.A., et al.*,
Case No. 22-cv-5660

Dear Judge Cote:

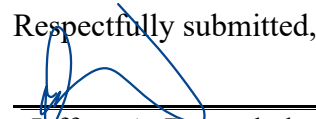
We write on behalf of appellees LATAM Airlines Group S.A. and its affiliated debtors and debtors-in-possession (collectively, “Appellees”) in response to the letter filed yesterday by appellant Ad Hoc Group of Unsecured Creditors (the “Ad Hoc Group Appellant”) requesting oral argument.

While the Appellees defer entirely to Your Honor as to whether oral argument would be helpful, we likewise wish to advise the Court of our conflicts. Assuming Your Honor desires to hold oral argument concurrently on the appeals of both the Ad Hoc Group Appellant and the TLA Claimholders Appellant after the latter appeal is fully briefed on August 15, among the dates desired by counsel for the Ad Hoc Group Appellant, my partner David Herrington (who would argue the latter appeal) and I (who would argue the former) are both available on either August 26 or August 29 but are otherwise out of town. Of course, should the Court desire oral argument on any other date during our respective vacations, with the exception of an irreconcilable conflict on August 22, Mr. Herrington and I would not hesitate to return to New York, as we presume Mr. Verrilli would should the Court desire oral argument during his vacation. Mr. Herrington and I are both also available any time after August 29.

Hon. Denise L. Cote, p. 2

Thank you for your consideration.

Respectfully submitted,



Jeffrey A. Rosenthal

*Attorney for LATAM Airlines Group
S.A. and its affiliated debtors and
debtors-in-possession*